

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

STEPHEN BRADSHAW, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BLUE DIAMOND GROWERS,

Defendant.

No.: 1:20-cv-05125

JOINT NOTICE OF CLASS SETTLEMENT

Counsel for plaintiff Stephen Bradshaw and Defendant Blue Diamond Growers (“BDG”) hereby notify the Court that the parties have reached an agreement to settle the above-captioned litigation on a classwide basis. As part of the agreed-upon settlement, the parties simultaneously settled an earlier-filed related putative class action pending before the Honorable Cathy Seibel in the Southern District of New York, *Biegel v. Blue Diamond Growers*, Case No. 7:20-cv-03032, and intend to seek approval of the settlement by Judge Seibel in that case.

In view of the parties’ settlement and the forthcoming Motion for Preliminary Approval to be submitted in *Biegel*, the parties respectfully request that the Court adjourn all dates and deadlines, including, without limitation, the deadline for BDG to answer, move, or otherwise respond to the Complaint, pending final approval of the class settlement by Judge Seibel. The parties will promptly notify the Court when such approval is obtained or if they fail to obtain such approval.

Dated: March 19, 2020

Respectfully submitted,

/s/ Michael Reese

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